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Megan Klatt, on behalf of herself
and all others similarly situated*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MEGAN KLATT, an individual, on behalf of herself and all others similarly situated,

Case No.: 2:17-cv-02425-RFB-BNW

Plaintiff,

VS.

DIGNITY HEALTH, a California corporation; DOES 1-50, unknown individuals; and ROE COMPANIES 1-50, unknown business entities.

Defendants.

**STIPULATION AND ORDER TO
CONTINUE SETTLEMENT
DOCUMENTS DEADLINE (Fifth Request)**

Plaintiff Megan Klatt (“Plaintiff”), by and through her attorneys of record, and Defendant Dignity Health (“Defendant”) (collectively, the “Parties”), by and through its attorneys of record, submit this Stipulation and Order to Continue Settlement Documents Deadline (Fifth Request) (the “Stipulation”).

On February 28, 2019, the Parties participated in a mediation and subsequently reached a settlement in principal. Therefore, on April 5, 2019, the Parties submitted a Stipulation and Order to Suspend Dispositive Motion Deadlines Pending Settlement (“Stipulation to Suspend”).

1 requesting that the dispositive motion deadlines be suspended while the Parties worked diligently
2 to draft and agree upon the requisite settlement documents, ECF No. 86.

3 On April 10, 2019, the Court issued an Order granting the Stipulation to Suspend and
4 directed the Parties to file a stipulation to dismiss or dispositive motions by May 17, 2019, ECF
5 No. 87.

6 On May 16, 2019, the Parties filed a Stipulation and Order to Continue Settlement
7 Documents Deadline (First Request), ECF No. 89, which the Court granted on May 17, 2019,
8 ECF No. 93, because they needed additional time to complete the drafting of the settlement
9 documents given the complexity of the issues and length of documents, including a Joint Motion
10 for Preliminary Approval of Class Action Settlement and the associated Joint Stipulation of
11 Settlement, as well as various documents to be provided to the putative class members, which will
12 require Court approval.

13 On July 1, 2019, the Parties filed a Stipulation and Order to Continue Settlement
14 Documents Deadline (Second Request), ECF No. 95, which the Court granted on July 3, 2019,
15 ECF No. 96, because they needed additional time to complete the drafting of the settlement
16 documents. The settlement papers are currently due on July 10, 2019, ECF No. 96.

17 On July 19, 2019, the Parties filed a Stipulation and Order to Continue Settlement
18 Documents Deadline (Fourth Request), ECF No. 99, which the Court granted on July 22, 2019,
19 ECF No. 100, because they needed additional time to complete the drafting of the settlement
20 documents as Plaintiff's counsel was out of the office traveling. The settlement papers are
21 currently due on July 26, 2019, ECF No. 100.

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1 Since the last extension was granted, the Parties have continued to work diligently to
2 finalize the settlement papers and are hopeful that they have agreement on all substantive issues.
3 However, they still also need to secure the signatures of the respective parties. As such, the
4 Parties request an additional seven (7) days, through and including August 2, 2019, to get the
5 documents executed and submit the papers for Court approval.

6 This Stipulation is submitted in good faith and not for the purpose of delay.
7

8 DATED: July 26th, 2019

SEMENTZA KIRCHER RICKARD

9 /s/ Lawrence J. Semenza, III
10 Lawrence J. Semenza, III, Bar No. 7174
11 Christopher D. Kircher, Bar No. 11176
12 Jarrod L. Rickard, Bar No. 10203
13 10161 Park Run Drive, Suite 150
14 Las Vegas, NV 89145

15 *Attorneys for Plaintiff, on behalf of
16 herself and all others similarly situated*

17 DATED: July 26th, 2019

JACKSON LEWIS P.C.

18 /s/ Kirsten A. Milton
19 Kirsten A. Milton, Bar No. 14401
20 Daniel I. Aquino, Bar No. 12682
21 300 S. Fourth Street, Suite 900
22 Las Vegas, NV 89101

23 *Attorneys for Defendant*

24 **IT IS SO ORDERED.**

25 
26 UNITED STATES MAGISTRATE JUDGE.
27 DATED this 30th day of July 2019.
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